



RATON GAS TRANSMISSION COMPANY

223 N. Guadalupe #274 • Santa Fe, New Mexico 87501-1850 • (505) 445-5111

Ms. Linda Dougherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration (PHMSA)
233 Peachtree Street Suite 600
Atlanta, GA 30303

February 12, 2009

CPF 2-2008-1009M

Dear Ms. Linda Dougherty:

Raton Gas Transmission received your letter dated December 16, 2008 on January 12, 2009, concerning the findings of the July 22-24 and August 5-6, 2008 PHMSA review, pursuant to Chapter 601 of 49 United States Code. We are writing you to provide our modified Operations & Maintenance (O&M) Manual, Operator Qualification Plan (OQ Plan), and Pipeline Integrity Management (IM) Program in accordance with the apparent inadequacies listed in your referenced letter. After a comprehensive review of your comments and our documents, it became apparent that we would be able to adequately modify our manuals within the thirty day contest deadline. We were able to comprehensively address the changes required and incorporate them within the scope of our annual review and update of these documents.

RGT has ensured that each item outlined in your "Notice of Amendment Letter" was addressed and enhanced/corrected, as necessary in the RGT O&M Manual, OQ Plan, and IM Program in order to meet the regulations cited in your letter. We are providing an updated, complete copy of each of the referenced documents to complete your records prior to the requested forty-five day deadline of February 27, 2009. These copies will be transmitted via email to the PHMSA Team on or before February 13, 2009.

Thank you for your support.

Sincerely,

David N. Link
Vice President
Raton Gas Transmission
223 N Guadalupe St Suite 306
Santa Fe, NM 87501
505-984-0282 Office
505-984-0304 Fax
dlink@ratongas.com

Enclosures

RECEIVED FEB 17 2009